

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF SARA B.
TOMEZSKO IN OPPOSITION TO
PLAINTIFF'S MOTION TO
SUPPLEMENT**

I, SARA B. TOMEZSKO, subject to the penalties by law for perjury, do hereby declare the following to be true and correct on the basis of my personal knowledge. If called upon to do so, I would be competent to testify to the matters set forth in this declaration.

1. I am an associate at Paul Hastings LLP, a member in good standing of the Bar of the State of New York, and outside counsel for Defendant in this matter.

2. Google, through Paul Hastings, produced the document Bates labeled GOOG-ROWE-00057001–57006, submitted as Plaintiff's Exhibit 2 to the Motion for Leave to File Supplemental Pleadings (the "Motion to Supplement"), on July 10, 2020.

3. Google, through Paul Hastings, produced the document Bates labeled GOOG-ROWE-00017507–17508, submitted as Plaintiff's Exhibit 4 to the Motion to Supplement (ECF 77-2) on January 7, 2020.

4. Google, through Paul Hastings, produced the document Bates labeled GOOG-ROWE-00056272–56273, submitted as Plaintiff's Exhibit 5 to the Motion to Supplement on June 3, 2020.

5. Google, through Paul Hastings, produced the documents Bates labeled GOOG-ROWE-P-00004412–4414, submitted as Plaintiff's Exhibit 7 to the Motion to Supplement (ECF 77-4) on May 15, 2020.

6. Google, through Paul Hastings, produced the document Bates labeled GOOG-ROWE-00060571–60573, submitted as Plaintiff’s Exhibit 8 to the Motion to Supplement (ECF 77-5) on September 16, 2020. Plaintiff identified for production a portion of the email thread, through the communication on February 5, 2020, Bates labeled GOOG-ROWE-P-00004415–4416, which Google produced on May 15, 2020.

7. Plaintiff submitted Exhibits 2, 3, and 5 to her Motion to Supplement to Your Honor via email on December 16, 2020.

8. Attached to my declaration as Exhibit A are relevant excerpts of email correspondence between my firm and Plaintiff’s counsel, dated October 13, 2020, and October 16, 2020, that include her request for discovery related to the VP Sales role. Between Plaintiff’s email and Google’s response, Google completed Plaintiff’s deposition and defended the deposition of Shaukat.

9. Attached to my declaration as Exhibit B is email correspondence from Plaintiff’s counsel dated November 25, 2020, and the last page of the letter attached to that email, OGDMS 2000449 1 (003).pdf, which renews Plaintiff’s request for discovery related to the VP Sales role.

10. On December 3, 2020, the parties met and conferred about the discovery issues raised in Plaintiff’s November 25, 2020, correspondence, including the discovery request related to the VP Sales role. During this meet and confer conference, Plaintiff indicated that she intended to supplement her complaint to assert additional facts concerning the VP Sales role.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

Signed on the 29th day of December, 2020 in Jersey City, New Jersey.


Sara Tomezsko